

PRIVACY NOTICE

1. Introduction

Sungen Systems (Pty) Ltd (“Sungen”) recognises the importance of privacy and the protection of personal information provided to it and is committed to the safeguarding of such information. This privacy policy explains how Sungen collects and uses personal information. It contains information regarding the rights of natural and juristic persons to whom personal information relates (data subjects). Sungen reserves the right to amend this Privacy Policy or add provisions to it at any time by publishing an updated version on its website.

2. Collection of Information

Sungen collects personal information in various instances, including when:

- data subjects contact Sungen or request information or services;
- Sungen provides services to data subjects;
- persons apply for employment at Sungen;
- when persons use Sungen’s websites or engage with Sungen through social media.

Sungen may collect the information directly from a data subject or from third parties (such as regulators, government authorities and registries, or attorneys representing our clients’ counterparties). The interaction with the firm on an Sungen website will result in the collection of information regarding the person’s activities on the website. Similarly, when anyone engages with the firm via any one of Sungen’s social media platforms. This information includes, but is not limited to, the person’s name, contact details and information regarding the matter with which they need assistance. In the course of engaging with clients on matters, Sungen will naturally be exposed to and collect personal information which includes the data subject’s name, contact details, financial information as well as information regarding the matters that the firm assists them with.

3. Basis and Purpose for Processing Personal Information

Sungen may process personal information:

- to provide services to clients;
- to comply with legal or regulatory obligations;
- if a data subject has provided their consent; or
- if the processing is allowed by law.

The purposes for which Sungen processes personal information include, but are not limited to:

- marketing and promotion of Sungen’s services;
- providing and improving services to clients;

- improving users' experience when using Sungen's websites;
- communicating with persons for Sungen's internal purposes;
- enabling Sungen's internal operations;
- exercising and defending legal rights.

4. Disclosure of Personal Information

Sungen may release personal information or disclose it to third parties in certain circumstances. These include, but are not limited to:

- if Sungen is required or authorised to do so by law or a court order;
- in order for Sungen to enforce its rights;
- in order for Sungen to provide services to its clients.

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

- matters or parties involved in legal services;
- third party service providers to Sungen or its clients;
- third parties who provide services to Sungen or its clients;
- government authorities and registries, organs of state, regulators, courts, tribunals and law enforcement agencies.

5. Transfer of Personal Information

Personal information collected by Sungen 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 the data subject's country. However, Sungen will take reasonable steps to ensure that recipients in other countries have appropriate privacy measures in place.

6. Retention of Personal Information

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

7. Cookies

Sungen's website makes use of cookies. Cookies store information regarding website visitors. Cookies have various purposes, such as improving the visitor's experience on the website and facilitating their use of the website. A website visitor may disable or decline cookies. However, if the visitor does so, their user experience on the site may be diminished.

8. Direct Marketing

Sungen may send marketing and promotional communications and material to persons. Recipients may opt out from receiving such communications by contacting Sungen at the

details provided below or by clicking on the opt-out link that will be contained in the relevant electronic communication.

9. Security

Sungen takes all reasonable steps to protect and avoid unauthorised access to personal information. It has implemented various policies, procedures and software to safeguard personal information and routinely reviews its operations in order to ensure that personal information is adequately protected.

10. Data Subject Rights

The law might provide data subjects with rights to access, amend or delete personal information that is in the possession of Sungen. However, Sungen may, in certain instances, legally refuse or decline such requests. If applicable, a data subject may also have the right to object to Sungen's processing of their personal information or to file a complaint with a regulator. If a data subject wishes to exercise their rights, they can contact Sungen at the details provided below. Sungen may charge data subjects a fee for accessing, amending or deleting their personal information. Data subjects are encouraged to contact Sungen in order to update their personal information as and when necessary.

11. Contact Details

In order to contact Sungen for purposes relating to this privacy policy, please contact us using these contact details:

Tina Dhevalall

Telephone: +27 (0)79 145 6125

E-mail: info@sungensystems.co.za