Privacy Notice

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Contents

1 Who we are and what we do 1
2 What personal information we collect about you 1
3 How we obtain the personal information about you 2
4 How we use your personal information 2
5 Who we share your personal information with 3
6 Which countries we transfer your personal information to 4
7 How long we keep your personal information 4
8 How we protect your personal information 4
9 Access to your personal information 4
10 What rights you have in relation to your personal information 4
11 Who is the responsible party in respect of your personal information 5
12 How we use cookies and similar technologies 5
13 How you can contact us 6
14 How we may update this privacy notice 6

Introduction

Deneys takes data privacy seriously. We recognise and value the trust that individuals/data subjects place in us when providing us with personal information and we are committed to taking reasonable steps to safeguard the privacy and secure personal information we may collect from visitors to our websites, visitors to our premises, our service providers and/or the clients to whom we provide legal and other services.

This privacy notice aims to help you understand our personal information collection practices, the legal grounds that justify our use of your personal information and our disclosure practices. Further notices highlighting certain uses we wish to make of your personal information together with the ability to opt in or out of selected uses may also be provided to you when we collect personal information from you. This privacy notice supplements other notices and privacy policies we may provide to you from time to time and is not intended to override them.

Please note: This privacy notice does not apply to, and Deneys is not responsible for, any third-party websites which may be accessible through links from this website. If you follow a link to any of these third-party websites, they will have their own privacy policies and you will need to check these policies before you submit any personal information to such third-party websites.

1 Who we are and what we do

Deneys Reitz Inc is a South African firm practicing under the name and style Deneys. Deneys provides South Africa's pre-eminent corporations and financial institutions with a full business law service.

2 What personal information we collect about you

We may collect and process different types of personal information in the course of operating our business and providing our services. These **may** include (but are not limited to):

2.1 Basic personal details such as your name, age, sex and job title;

2.2 Contact information such as your telephone number and postal or email address;

2.3 Financial information such as payment related information or bank account details;

2.4 Demographic information such as your address, preferences or interests;

2.5 Electronic identifying data and other technical information such as details of your website usage and identifiers or information collected through cookies and other tracking technologies;

2.6 Personal information provided to us by you or generated by us in the course of providing our services, which may, where relevant, include special personal information;

2.7 Details of transactions or services that we carry out for you as well as records of correspondence or enquiries from you or anyone acting on your behalf;

2.8 Identification and other background verification information such as a copy of passports or utility bills or evidence of beneficial ownership or the source of funds to comply with client due diligence/"know your client"/anti-money laundering laws and collected as part of our client acceptance and ongoing monitoring procedures;

2.9 Recruitment related information such as your curriculum vitae, your education and employment history, details of professional memberships and other information relevant to potential recruitment to Deneys;

2.10 Information that you may provide to us in course of registering for and attending events or meetings, including access and dietary requirements;

2.11 CCTV footage which is recorded via our CCTV cameras at our offices; and

2.12 Any other personal information relating to you that you may provide (including sensitive and special categories of personal information).

3 How we obtain the personal information about you

We may collect or receive your personal information a number of different ways:

3.1 Where you provide it to us directly, for example by corresponding with us by email, or via other direct interactions with us such as completing a form on our website or registering for and using one of our online tools or indirectly (through an agent or intermediary);

3.2 Third party sources, for example, where we collect information about you to assist with "know your client" checks as part of our client acceptance procedures or to carry out our everyday operations for example where we receive information about you from credit bureaux or recruitment agencies for a specific related purpose; of

3.3 Publicly available sources – we may, for example, use such sources to help us keep the contact details we already hold for you accurate and up to date or for professional networking purposes.

4 How we use your personal information

4.1 We will only use your personal information where we are permitted to do so by applicable law. Under the Protection of Personal Information Act, 2013 (POPIA) (and EU and UK data protection laws), the use of personal information must be justified under one of a number of legal grounds, the principal legal grounds that justify our use of your personal information are:

(1) Contract performance: where your information is necessary to enter into or perform our contract with you.

(2) Legal obligation: where we need to use your information to comply with our legal obligations.

(3) Legitimate interests: where we use your information to achieve our or your legitimate interests and our reasons for using it outweigh any prejudice to your data protection rights.

(4) Legal claims: where your information is necessary for us to defend, prosecute or make a claim on behalf of you, us or a third party.

(5) Consent: where you have consented to our use of your information.

4.2 We may use your personal information in the following ways:

(1) To provide our legal and other services to you and to conduct our business – to administer and perform our services, including to carry out our obligations arising from any agreements entered into between you and us (please note that our Standard Terms of Engagement apply where we provide legal services) and for operational auditing, legal and record-keeping purposes;

(2) To facilitate use of our website and to ensure content is relevant – to respond to requests for information or enquiries from visitors to our website and to ensure that content from our website is presented in the most effective manner for you and for your device;

(3) For marketing and business development purposes – to provide you with details of new services, legal updates and invites to seminars and events where you have chosen to receive these. We will provide an option to unsubscribe or opt-out of further communication or any electronic marketing communication sent to you or you may opt out by contacting us as set out in paragraph 13 below;

(4) For research and development purposes – analysis in order to better understand your and our clients' services and marketing requirements and to better understand our overall business and to evaluate, develop and improve our services and offerings;

(5) For recruitment purposes – to enable us to process applications for employment submitted via our website and to assess your suitability for any position for which you may apply at Deneys;

(6) To fulfil our legal, regulatory, or risk management obligations – to comply with to comply with our legal obligations (performing client due diligence/"know your client", anti-money laundering, anti-bribery, sanctions or reputational risk screening, identifying conflicts of interests); for the prevention of fraud and/or other relevant background checks as may be required by applicable law and regulation and best practice at any given time (if false or inaccurate information is provided and fraud is identified or suspected, details may be passed to fraud prevention agencies and may be recorded by us or by them); to enforce our legal rights, to comply with our legal or regulatory reporting obligations and/or to protect the rights of third parties;

(7) To ensure that we are paid – to recover any payments due to us and where necessary to enforce such recovery through the engagement of debt collection agencies or taking other legal action (including the commencement and carrying out of legal and court proceedings);

(8) To inform you of changes – to notify you about changes to our services or our Standard Terms of Engagement for legal services or this privacy notice;

(9) To reorganise or make changes to our business – in the event that we undergo a re-organisation (for example if we merge, combine or divest a part of our business), we may need to transfer some or all of your personal information to the relevant third party (or its advisors) as part of any due diligence process or transfer to that re-organised entity or third party your personal information for the same purposes as set out in this privacy notice or for the purposes of analysing any proposed re-organisation.

4.3 Where we need to collect personal information by law, or under the terms of a contract we have with you, and you fail to provide that information when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with our services). In this case, we may not be able to proceed with a particular engagement we have or intend to have with you (this may include cancelling a service you have with us), but we will notify you if this is the case at the time.

5 Who we share your personal information with

5.1 We may share your personal information with a variety of the following categories of third parties for the purposes of rendering our services and for the reasons recorded in clause 4 above:

(1) Our professional advisers (eg legal, financial, business, risk management or other advisers), bankers and auditors;

(2) Our insurers and insurance brokers;

(3) Third party service providers; and/or

(4) Other third party external advisers or experts engaged in the course of the services we provide to our clients and with their prior consent.

5.2 We may also process your personal information to comply with our regulatory requirements or in the course of dialogue with our regulators as applicable, which may include disclosing your personal information to government, regulatory or law enforcement agencies in connection with enquiries, proceedings or investigations by such parties anywhere in the world or where compelled to do so. Where permitted, or unless to do so would prejudice the prevention or detection of a crime, we will direct any such request to you or notify you before responding.

6 Which countries we transfer your personal information to

6.1 We cannot limit our processing of a data subject's personal information to the country in which that data subject is based. In the course of providing our services, we may need to transfer personal information to locations outside the jurisdiction in which you provide it or where you are viewing our website.

6.2 Regardless of the location of our processing, we will impose the same data protection safeguards globally and implement appropriate measures to ensure that your personal information is protected in accordance with applicable data protection laws. Where a third party service provider processes the personal data on our behalf, we will ensure that appropriate measures are in place to ensure an adequate level of protection for your personal information.

7 How long we keep your personal information

7.1 We will retain your personal information only for as long as is necessary to fulfil the purpose for which this information was collected and any other permitted linked purpose (for example certain transaction details and correspondence related to any legal services we provide may be retained until the time limit for claims in respect of the transaction has expired or in order to comply with regulatory requirements regarding the retention of such information). If your personal information is used for two purposes we will retain it until the purpose with the latest period expires, but we will stop using it for the purpose with a shorter period once that period expires.

7.2 Our retention periods are also based on our business needs and good practice.

8 How we protect your personal information

8.1 We recognise that information security is an integral element of data privacy. While no data transmission (included over the Internet or any website) can be guaranteed to be secure from intrusion, we implement a range of commercially reasonable physical, technical and procedural measures to help protect personal information from unauthorised access, use, disclosure, alternation or destruction in accordance with data protection law requirements.

8.2 Information that you provide to us is stored on our or our service providers' secure servers and accessed and used subject to our security policies and standards, or those agreed with our service providers. Deneys holds the ISO/IEC 2701 2013 (ISO 27001) accreditation for its IT operations globally. ISO27001 is an intentionally recognised certification that information security is managed in line with best practice.

8.3 Everyone at Deneys and any third party service providers we may engage that process personal information on our behalf (for the purposes listed above) are also contractually obligated to respect the confidentially of personal information.

8.4 Alongside our role, please also note that where we have given you (or where you have chosen) a password which enables you to access certain parts of your websites or online services, you are responsible for keeping this password confidential and for complying with any other security procedures that we notify you of. We ask you not to share a password with anyone.

9 Access to your personal information

You may request details of personal information which we hold about you under the Promotion of Access to Information Act, 2000 ("PAIA"). Fees to obtain a copy or a description of personal information held about you are prescribed in terms of PAIA. Confirmation of whether or not we hold personal information about you may be requested free of charge. If you would like to get access to/obtain a copy of your personal information held by us, please contact us via the details provided in paragraph 13 below and review our PAIA Manual located on our website.

10 What rights you have in relation to your personal information

10.1 If you have any questions about our use of your personal information, you should first contact us via the details provided in paragraph 13 below. Under certain circumstances and in accordance with

the POPIA (and EU or other applicable data protection laws), you may have the right to require us to:

(1) Have your personal information lawfully processed;

(2) Be notified that personal information about you is being collected;

(3) Be notified that your personal information has been accessed or acquired by an unauthorised person;

(4) Establish whether a responsible party holds personal information of you and to request access to this personal information (see paragraph 9 above).

(5) Request, where necessary, the correction, destruction or deletion of your personal information;

(6) Object to the processing of your personal information;

(7) Not have your personal information processed for purposes of direct marketing by means of unsolicited electronic communications;

(8) Not be subject, under certain circumstances, to a decision which is based solely on the basis of the automated processing of your personal information intended to provide a profile of you;

(9) Submit a complaint to the Information Regulator regarding alleged interference with the protection of personal information of any data subject or to submit a complaint to the Information Regulator in respect of a determination of an adjudicator; and

(10) Institute civil proceedings regarding an alleged interference with the projection of your personal information.

10.2 You may also instruct us not to process your personal information for marketing purposes. You can exercise your right to prevent such processing at any time by using an unsubscribe facility.

10.3 It is important that the information that we hold about you is accurate and up to date. Please let us know if any of the personal information that you have provided to us changes.

10.4 While it is our policy to respect the rights of data subjects, please be aware that your exercise of these rights are subject to certain exemptions to safeguard the public interest (eg the prevention or detection of crime), our interests (eg the maintenance of legal privilege) and some of these rights may be limited (for example the right to withdraw consent) where we are required or permitted by law to continue processing your personal information to defend our legal rights or meet our legal and regulatory obligations.

10.5 If you contact us to exercise any of these rights we will check your entitlement and respond within 30 days. If you are not satisfied with our use of your personal information or our response to any exercise of these rights, you have the right to complain to the Information Regulator, whose current contact details are set out below:

The Information Regulator
POPIAComplaints@inforegulator.org.za
PAIAComplaints@inforegulator.org.za

11 Who is the responsible party in respect of your personal information

Deneys is the responsible party in respect of your personal information (being the party processing your personal information).

12 How we use cookies and similar technologies

12.1 When you visit our website we may send a cookie/s to your computer. This is a small data file stored by your computer to help improve functionality or tailor information to provide visitors with more relevant pages. You can view and edit your cookies (in particular any permanent, unnecessary or optional cookies) through the cookies' directory on your browser installation. Please note that if you do not accept some cookies you may not be able to use some of our services.

12.2 We may also, directly or through third party service providers, identify and analyse website traffic in order to improve and tailor our website/our services. This may include but is not limited to:

Google Analytics: which you can opt-out of on the website being made available to Google Analytics by installing the browser plug-in available from Google. For more information on the privacy practices of Google please visit the Google Privacy Terms web page, which is currently: https://policies.google.com/privacy?hl=en.

13 How you can contact us

If you have any questions about this privacy notice or how we process your personal information, please contact us by sending an email to the Information Officer: rsaseniorcompliancegroup@deneys.co.za.

14 How we may update this privacy notice

We may amend this Notice from time to time, which may include instances where we do or do not provide notice. We therefore encourage you to review this privacy notice when you visit the website to stay informed of how we are using personal information.