

## PRIVACY STATEMENT

This privacy statement (the “**Privacy Statement**”) explains how we collect, retain, use and disclose your personal information, as is required by the Protection of Personal Information Act No. 4 of 2013, as amended from time to time.

At Shimazu Proprietary Limited (“**Shimazu**”), we are committed to protecting your privacy and to ensuring that your personal information is collected, retained, used and disclosed properly, lawfully and transparently.

### 1. **WHO WE ARE**

Shimazu is an independent, South African, professional services consultancy that specialises in providing packaged professional services through a subscription-based model.

### 2. **WHAT PERSONAL INFORMATION WE COLLECT**

2.1. We collect and process your personal information mainly to provide you:

2.1.1. as a client, with access to our services, to invoice or provide statements to you and to help us improve our service offerings to you;

2.1.2. as an employee, to communicate relevant developments and policies at Shimazu, to facilitate the provision of services and to facilitate administration of your employment (salary advices, salary payments, leave processing, claims, PAYE and related functions); and

2.1.3. as a service or product supplier, to facilitate and communicate in relation to service delivery, to deal with invoicing, statements and payments and to escalate matters that relate to service delivery.

2.2. The type of personal information we collect will depend on the purpose for which the personal information was collected and used, as stated in paragraph 2.1. We will only collect personal information which is adequate, relevant and not excessive in relation to the stated purpose for which the personal information was originally collected.

2.3. We collect personal information directly from you, for example when you use our services, engage with us in relation to services, engage with us as an employee or, if you are a supplier, when we engage with you.

2.4. The supply of your personal information is mandatory to enable us to effectively perform our obligations to you or to maintain our engagement.

- 2.5. Failure to provide your personal information, as reasonably required, will effectively prevent us from providing services to you or reacting to an invitation to propose for services and render the continuation of our employment and supplier relationships impossible, as same may apply to you.

### 3. **HOW WE USE YOUR PERSONAL INFORMATION**

- 3.1. We will use your personal information only for the purposes for which it was originally collected.
- 3.2. In complying with our obligations, we may also provide your personal information to other specialist advisors who have been contracted by us to provide administrative, compliance, financial, insurance, accounting, company secretarial, legal services or other professional services.
- 3.3. We will also use your personal information to comply with legal and regulatory requirements or industry codes, to which we subscribe or which apply to us, or when it is otherwise allowed by applicable law (for example; to protect Shimazu's legitimate legal interests).
- 3.4. We shall not retain your personal information for any longer than is reasonably necessary.

### 4. **OTHER SERVICES, LEGAL UPDATE BULLETIN AND COOKIES**

- 4.1. Paragraph 4 is only applicable if you are a client of Shimazu.
- 4.2. In light of our objective to provide you with personal and effective services, we would like to use your personal information to keep you informed about our other services, updates to our terms and conditions, updates to this Privacy Statement, updates to our website and to issue our monthly legal update bulletin to you.
- 4.3. Please email us at [info@shimazu.co.za](mailto:info@shimazu.co.za) if you do not wish to receive such updates and information. You may opt out, at any time, if you do not wish to receive any further communications of this nature.
- 4.4. Shimazu uses Google Ads Remarketing ("**Google Ads**") to advertise our website, platform and services across the internet.
- 4.5. Google Ads will display relevant ads tailored to you based on the parts of the Shimazu website you have viewed by placing a cookie on your machine.
- 4.6. THIS COOKIE DOES NOT IN ANY MANNER IDENTIFY YOU OR GIVE ACCESS TO YOUR COMPUTER. The cookie is used to say "This person visited this page, so show them ads that relate to that page".
- 4.7. Google Ads allows Shimazu to tailor our marketing campaigns to better suit your needs and only display ads that are relevant to you.

4.8. If you do not wish to participate in the Shimazu Google Ads campaign, you may opt out by visiting Google's Ads Preferences Manager.

## 5. **DISCLOSURE OF PERSONAL INFORMATION**

5.1. We may share your personal information with, and obtain personal information about you from:

5.1.1. third parties for the purposes listed above, for example fraud prevention agencies and law enforcement agencies;

5.1.2. specialist advisors; and

5.1.3. other third parties from whom you have chosen to receive marketing information.

5.2. We may also disclose your personal information:

5.2.1. where we have a duty or a right to disclose such personal information in terms of law or industry codes;

5.2.2. where we believe it is necessary to protect our rights; and

5.2.3. where we are legally obliged to provide adequate protection for the personal information we hold and to stop unauthorised processing of personal information.

5.3. We will, on an ongoing basis, continue to review our security controls, and related processes, to ensure that your personal information is secure.

5.4. It is our focus to safeguard the privacy of your personal information and we hold all personal information in secure computer facilities.

5.5. We have security policies and procedures in place, which cover:

5.5.1. computer and network security;

5.5.2. access to personal information;

5.5.3. secure communications;

5.5.4. security in contracting out activities or functions;

5.5.5. retention and disposal of personal information;

5.5.6. acceptable usage of personal information;

5.5.7. governance and regulatory issues;

5.5.8. monitoring access and usage of personal information; and

5.5.9. investigating and reacting to security incidents.

5.6. When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that all personal information, for which we are responsible, is kept secure.

5.7. We may need to transfer your personal information to another country for processing or storage. We will ensure that anyone that we pass your personal information to agrees to treat your personal information with the same or similar level of protection as that which we have provided to you in terms of this Privacy Statement.

## 6. **YOUR RIGHTS**

6.1. You have the right to request a copy of your personal information in our possession. You may contact us at the email and addresses listed below and specify what personal information you would like to receive. We will take all reasonable steps to confirm your identity before providing details of your personal information.

6.2. Please note that we are allowed to charge a reasonable fee for such access, however, that we have decided to grant such access free of charge.

6.3. You have a right, at any time and on reasonable grounds, to object to the processing of your personal information, at which time we shall immediately cease doing so and at which time your access or engagement will be terminated.

6.4. We endeavour to ensure that the personal information we hold is accurate and up to date. You have the right to request us to update, correct or delete your personal information. You may do so by contacting us at the email and addresses provided below.

6.5. We will take all reasonable steps to confirm your identity before making changes to personal information we may hold about you.

6.6. We would appreciate it if you would keep your personal information accurate. Please notify us at the email and addresses below when your personal information changes.

## 7. **CHANGES TO THIS PRIVACY STATEMENT**

Our Privacy Statement will be reviewed, from time to time, to take into account current legislation and to ensure that it remains appropriate to current circumstances. Please check our website periodically to inform yourself of any changes to the Privacy Statement.

## 8. HOW TO CONTACT SHIMAZU

Please contact us at the following email and addresses if you wish to enquire about any aspect of this Privacy Statement, exercise any right or if you wish to update your personal information:

**Physical Address:**

Shimazu (Pty) Ltd

WeWork

The Link

173 Oxford Road

Rosebank

Johannesburg

2196

South Africa

**Email:** [info@shimazu.co.za](mailto:info@shimazu.co.za)

**Website:** <https://www.shimazu.co.za>

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