

**ABMAN PROPRIETARY LIMITED
PRIVACY STATEMENT**

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1 DEFINITIONS

In this Policy (as defined below), unless the context requires otherwise, the following words and expressions bear the meanings assigned to them and cognate expressions bear corresponding meanings –

- 1.1 "**Abman**" means Abman Proprietary Limited (registration number 2014/083139/07), a professional company which renders legal services including legal advice and legal representation to individual clients, businesses and organisations, and includes all Abman Associated Entities. The terms "**we**", "**us**", and "**our**" shall have a corresponding meaning;
- 1.2 "**Abman Associated Entities**" means (i) Abfin (Proprietary) Limited, registration number 2006/030485/07; (ii) Abreal (Proprietary) Limited, registration number 1991/004365/07; (iii) Key Point Intelligence (Proprietary) Limited, registration number 2015/294047/07; (iv) Abcid (Proprietary) Limited, registration number 2021/590471/07; and (v) Valgro Solutions (Proprietary) Limited, registration 2013/131268/07;
- 1.3 "**Child**" means any natural person under the age of 18 (eighteen) years;
- 1.4 "**Data Breach**" means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Personal Information under the control of or in the possession of Abman;
- 1.5 "**Data Subject**" means the person to whom Personal Information relates;
- 1.6 "**Direct Marketing**" means to approach a person, by electronic communication, for the purpose of promoting or offering to supply, in the ordinary course of business, any goods or services to the Data Subject;
- 1.7 "**Direct Marketer**" means a supplier who employs Direct Marketing as an advertising mechanism;
- 1.8 "**Employees**" means any employee of Abman;
- 1.9 "**Operator**" means a person or entity who Processes Personal Information for a Responsible Party in terms of a contract or mandate, without coming under the direct authority of that Responsible Party;
- 1.10 "**Personal Information**" means information relating to a Data Subject, including but not limited to (i) views or opinions of another individual about the Data Subject; and (ii) information relating to such Data Subject's –
 - 1.10.1 race, sex, gender, sexual orientation, pregnancy, marital status, nationality, ethnic or social origin, colour, age, physical or mental health, well-being, disability, religion, conscience, belief, cultural affiliation, language and birth;

- 1.10.2 education, medical, financial, criminal or employment history;
- 1.10.3 names, identity number and/or any other personal identifier, including any number(s), which may uniquely identify a Data Subject, account or client number, password, pin code, customer or Data Subject code or number, numeric, alpha, or alpha-numeric design or configuration of any nature, symbol, email address, domain name or IP address, physical address, cellular phone number, telephone number or other particular assignment;
- 1.10.4 blood type, fingerprint or any other biometric information;
- 1.10.5 personal opinions, views or preferences;
- 1.10.6 correspondence that is implicitly or expressly of a personal, private or confidential nature (or further correspondence that would reveal the contents of the original correspondence); and
- 1.10.7 corporate structure, composition and business operations (in circumstances where the Data Subject is a juristic person) irrespective of whether such information is in the public domain or not;
- 1.11 "**Policy**" means this Privacy Policy;
- 1.12 "**POPIA**" means the Protection of Personal Information Act No. 4 of 2013;
- 1.13 "**Processing**" means any operation or activity or any set of operations, whether or not by automatic means, concerning Personal Information, including –
 - 1.13.1 the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
 - 1.13.2 dissemination by means of transmission, distribution or making available in any other form by electronic communications or other means; or
 - 1.13.3 merging, linking, blocking, degradation, erasure or destruction. For the purposes of this definition. "**Process**" has a corresponding meaning;
- 1.14 "**Regulator**" means the South African Information Regulator established in terms of POPIA;
- 1.15 "**Responsible Party**" means a public or private body or any other person which alone or in conjunction with others, determines the purpose of and means for Processing Personal Information;
- 1.16 "**Special Personal Information**" means Personal Information concerning a Data Subject's religious or philosophical beliefs, race or ethnic origin, trade union membership, political opinions, health, sexual life, sexual orientation, genetic information, biometric information or criminal behaviour;

- 1.17 **"Third Party"** means any independent contractor, agent, consultant, sub-contractor or other representative of Abman; and
- 1.18 **"Website"** means the Abman website currently located at <https://abreal.co.za/>.

2 **PURPOSE OF THIS POLICY**

The purpose of this Policy is to inform Data Subjects about how Abman Processes their Personal Information.

3 **APPLICATION**

- 3.1 Abman, in its capacity as Responsible Party and/or Operator, shall strive to observe, and comply with its obligations under POPIA, as well as accepted information protection principles, practices and guidelines when it Processes Personal Information from or in respect of a Data Subject.
- 3.2 This Policy applies to Personal Information collected by Abman in connection with the services which we offer and provide. This includes information collected directly from you as a Data Subject, as well as information we collect indirectly through our Direct Marketing campaigns and online through our websites, branded pages on Third Party platforms and applications accessed or used through such websites or Third Party platforms which are operated by or on behalf of Abman.
- 3.3 This Privacy Policy does not apply to the information practices of Third Party companies who we may engage with in relation to our business operations (including, without limitation, their websites, platforms and/or applications) which we do not own or control; or individuals that Abman does not manage or employ. These Third Party sites may have their own privacy policies and terms and conditions and we encourage you to read them before using them.

4 **PROCESS OF COLLECTING PERSONAL INFORMATION**

- 4.1 Abman collects Personal Information directly from Data Subjects, unless an exception is applicable (such as, for example, where the Data Subject has made the Personal Information public or the Personal Information is contained in or derived from a public record).
- 4.2 Abman will always collect Personal Information in a fair, lawful and reasonable manner to ensure that it protects the Data Subject's privacy and will Process the Personal Information based on legitimate grounds in a manner that does not adversely affect the Data Subject in question.
- 4.3 Abman often collects Personal Information directly from the Data Subject and/or in some cases, from Third Parties.

- 4.4 Where Abman obtains Personal Information from Third Parties, Abman will ensure that it obtains the consent of the Data Subject to do so or will only Process the Personal Information without the Data Subject's consent where Abman is permitted to do so in terms of clause 4.1 above.
- 4.5 An example of such Third Parties include: (i) our clients when Abman handles Personal Information on their behalf; (ii) credit reference agencies; (iii) other companies providing services to Abman; and (iv) where Abman makes use of publicly available sources of information.

5 **LAWFUL PROCESSING OF PERSONAL INFORMATION**

- 5.1 Where Abman is the Responsible Party, it will only Process a Data Subject's Personal Information (other than for Special Personal Information) where –
- 5.1.1 consent of the Data Subject (or a competent person where the Data Subject is a Child) is obtained;
 - 5.1.2 Processing is necessary to carry out the actions for conclusion of a contract to which a Data Subject is party;
 - 5.1.3 Processing complies with an obligation imposed by law on Abman;
 - 5.1.4 Processing protects a legitimate interest of the Data Subject;
 - 5.1.5 Processing is necessary for pursuing the legitimate interests of Abman or of a third party to whom the information is supplied; and/or
 - 5.1.6 Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in Abman.
- 5.2 Abman will only Process Personal Information where one of the legal bases referred to in paragraph 5.1 above are present.
- 5.3 Abman will make the manner and reason for which the Personal Information will be Processed clear to the Data Subject.
- 5.4 Where Abman is relying on a Data Subject's consent as the legal basis for Processing Personal Information, the Data Subject may withdraw his/her/its consent or may object to Abman's Processing of the Personal Information at any time. However, this will not affect the lawfulness of any Processing carried out prior to the withdrawal of consent.
- 5.5 If the consent is withdrawn or if there is otherwise a justified objection against the use or the Processing of such Personal Information, Abman will ensure that the Personal Information is no longer Processed.

6 SPECIAL PERSONAL INFORMATION AND PERSONAL INFORMATION OF CHILDREN

- 6.1 Special Personal Information is sensitive Personal Information of a Data Subject and Abman acknowledges that it will generally not Process Special Personal Information unless (i) processing is carried out in accordance with the Data Subject's explicit consent; or (ii) information has been deliberately made public by the Data Subject; or (iii) processing is necessary for the establishment, exercise or defence of a right or legal claim or obligation in law); or (iv) processing is for historical, statistical or research purposes, subject to stipulated safeguards; or (v) specific authorisation has been obtained in terms of POPIA; and
- 6.2 Abman acknowledges that it may not Process any Personal Information concerning a Child and will only do so where it has obtained the consent of the parent or guardian of that Child or where it is permitted to do so in accordance with applicable laws.

7 PURPOSE FOR PROCESSING PERSONAL INFORMATION

- 7.1 Abman understands its obligation to make Data Subjects aware of the fact that it is Processing their Personal Information and inform them of the purpose for which Abman Processes such Personal Information.
- 7.2 Abman will only Process a Data Subject's Personal Information for a specific, lawful and clear purpose (or for specific, lawful and clear purposes) and will ensure that it makes the Data Subject aware of such purpose(s) as far as possible.
- 7.3 It will ensure that there is a legal basis for the Processing of any Personal Information. Further, Abman will ensure that Processing will relate only to the purpose for and of which the Data Subject has been made aware (and where relevant, consented to) and will not Process any Personal Information for any other purpose(s).
- 7.4 Abman will generally use Personal Information for purposes required to operate and manage its normal business operations and these purposes include one or more of the following non-exhaustive purposes –
- 7.4.1 For the purposes of providing its services to the Data Subject from time to time;
- 7.4.2 Personal Information is processed in order to conduct due diligence processes on Abman's clients;
- 7.4.3 Personal Information is processed in order to comply with obligations imposed on Abman under the Based Black Economic Empowerment Act

No. 53 of 2003 ("**BEE Act**") read together with the Department of Trade and Industry's Codes of Good Practice on Broad-Based Black Economic Empowerment published in terms of Government Gazette No. 36928 on 11 October 2013 under section 9(1) of the BEE Act, as amended or reissued from time to time;

- 7.4.4 Personal Information is processed for the purposes of performing general information technology-related functions for all business functions within Abman;
- 7.4.5 For purposes of interacting with you on our Website and generally monitoring your use our Website, including for purposes of improving same;
- 7.4.6 For internal audit purposes (i.e. ensuring that the appropriate internal controls are in place in order to mitigate the relevant risks, as well as to carry out any investigations where this is required);
- 7.4.7 For employment-related purposes such as administering payroll, assessing credit and criminal history, and determining Employment Equity Act No. 55 of 1998 statistics;
- 7.4.8 To respond to any correspondence that the Data Subject may send to Abman, including via email, Website or by telephone;
- 7.4.9 In connection with the execution of payment processing functions, including payment of Abman's suppliers' invoices;
- 7.4.10 To contact the Data Subject for direct marketing purposes subject to the provisions of clause 10 below;
- 7.4.11 For purposes of carrying out company secretarial functions;
- 7.4.12 To perform insurance related functions;
- 7.4.13 To perform asset, fund and property management function on behalf of our clients;
- 7.4.14 To perform security related functions in respect of our clients;
- 7.4.15 To perform treasury related functions;
- 7.4.16 For such other purposes to which the Data Subject may consent from time to time; and
- 7.4.17 For such other purposes as authorised in terms of applicable law.

8 KEEPING PERSONAL INFORMATION ACCURATE

- 8.1 Abman will take reasonable steps to ensure that all Personal Information is kept as accurate, complete and up to date as reasonably possible depending on the purpose for which Personal Information is collected or further processed.
- 8.2 Abman may not always expressly request the Data Subject to verify and update his/her/its Personal Information, unless this process is specifically necessary.
- 8.3 Abman, however, expects that the Data Subject will notify Abman from time to time in writing of any updates required in respect of his/her/its Personal Information.

9 STORAGE AND PROCESSING OF PERSONAL INFORMATION BY ABMAN AND THIRD PARTY SERVICE PROVIDERS

- 9.1 Abman may store your Personal Information in hardcopy format and/or in electronic format using Abman's own secure on-site servers or other internally hosted technology. Your Personal Information may also be stored by Third Parties, via cloud services or other technology, with whom Abman has contracted with, to support Abman's business operations.
- 9.2 Abman's Third Party service providers, including data storage and processing providers, may from time to time also have access to a Data Subject's Personal Information in connection with purposes for which the Personal Information was initially collected to be Processed.
- 9.3 Abman will ensure that such Third Party service providers will process the Personal Information in accordance with the provisions of this Policy, all other relevant internal policies and procedures and POPIA.
- 9.4 These Third Parties do not use or have access to your Personal Information other than for purposes specified by us, and Abman requires such parties to employ at least the same level of security that Abman uses to protect your personal data.
- 9.5 Your Personal Information may be Processed in South Africa or another country where Abman, its affiliates and their Third Party service providers maintain servers and facilities and Abman will take steps, including by way of contracts, to ensure that it continues to be protected, regardless of its location, in a manner consistent with the standards of protection required under applicable law.

10 PERSONAL INFORMATION FOR DIRECT MARKETING PURPOSES

- 10.1 To the extent that Abman acts in its capacity as a Direct Marketer, it shall strive to observe, and comply with its obligations under POPIA when implementing principles and practices in relation to Direct Marketing.
- 10.2 Abman acknowledges that it may only use Personal Information to contact the Data Subject for purposes of Direct Marketing from time to time where it is permissible to do so.
- 10.3 It may use Personal Information to contact any Data Subject and/or market Abman's services directly to the Data Subject(s) if the Data Subject is one of Abman's existing clients, the Data Subject has requested to receive marketing material from Abman or Abman has the Data Subject's consent to market its services directly to the Data Subject.
- 10.4 If the Data Subject is an existing client, Abman will only use his/her/its Personal Information if it has obtained the Personal Information through the provision of a service to the Data Subject and only in relation to similar services to the ones Abman previously provided to the Data Subject.
- 10.5 Abman will ensure that a reasonable opportunity is given to the Data Subject to object to the use of their Personal Information for Abman's marketing purposes when collecting the Personal Information and on the occasion of each communication to the Data Subject for purposes of Direct Marketing.
- 10.6 Abman will not use your Personal Information to send you marketing materials if you have requested not to receive them. If you request that we stop Processing your Personal Information for marketing purposes, Abman shall do so. We encourage that such requests to opt-out of marketing be made via forms and links provided for that purpose in the marketing materials sent to you.

11 RETENTION OF PERSONAL INFORMATION

- 11.1 Abman may keep records of the Personal Information it has collected, correspondence, or comments in an electronic or hardcopy file format.
- 11.2 Abman will not retain personal information for a period longer than is necessary to achieve the purpose for which it was collected or processed and is required to delete, destroy (in such a way that it cannot be reconstructed) or de-identify the information as soon as is reasonably practicable once the purpose has been achieved. This prohibition will not apply in the following circumstances –
- 11.2.1 where the retention of the record is required or authorised by law;
- 11.2.2 Abman requires the record to fulfil its lawful functions or activities;

- 11.2.3 retention of the record is required by a contract between the parties thereto;
 - 11.2.4 the data subject (or competent person, where the data subject is a child) has consented to such longer retention; or
 - 11.2.5 the record is retained for historical, research or statistical purposes provided safeguards are put in place to prevent use for any other purpose.
- 11.3 Accordingly, Abman will, subject to the exceptions noted herein, retain Personal Information for as long as necessary to fulfil the purposes for which that Personal Information was collected and/or as permitted or required by applicable law.
- 11.4 Where Abman retains Personal Information for longer periods for statistical, historical or research purposes, Abman will ensure that appropriate safeguards have been put in place to ensure that all recorded Personal Information will continue to be Processed in accordance with this Policy and the applicable laws.
- 11.5 Once the purpose for which the Personal Information was initially collected and Processed no longer applies or becomes obsolete, Abman will ensure that the Personal Information is deleted, destroyed or de-identified sufficiently so that a person cannot re-identify such Personal Information.
- 11.6 In instances where we de-identify your Personal Information, Abman may use such de-identified information indefinitely.

12 FAILURE TO PROVIDE PERSONAL INFORMATION

- 12.1 Should Abman need to collect Personal Information by law or under the terms of a contract that Abman may have with you and you fail to provide the Personal Information when requested, we may be unable to perform the contract we have or are attempting to enter into with you.
- 12.2 In such a case, Abman may have to decline to provide or receive the relevant services, and you will be notified where this is the case.

13 SAFE-KEEPING OF PERSONAL INFORMATION

- 13.1 Abman shall preserve the security of Personal Information and, in particular, prevent its alteration, loss and damage, or access by non-authorized third parties.

- 13.2 Abman will ensure the security and integrity of Personal Information in its possession or under its control with appropriate, reasonable technical and organisational measures to prevent loss, unlawful access and unauthorised destruction of Personal Information.
- 13.3 Abman has implemented physical, organisational, contractual and technological security measures (having regard to generally accepted information security practices or industry specific requirements or professional rules) to keep all Personal Information secure, including measures protecting any Personal Information from loss or theft, and unauthorised access, disclosure, copying, use or modification.
- 13.4 Further, Abman maintains and regularly verifies that the security measures are effective and regularly updates same in response to new risks.

14 BREACHES OF PERSONAL INFORMATION

- 14.1 A Data Breach refers to any incident in terms of which reasonable grounds exist to believe that the Personal Information of a Data Subject has been accessed or acquired by any unauthorised person.
- 14.2 A Data Breach can happen for many reasons, which include: (a) loss or theft of data or equipment on which Personal Information is stored; (b) inappropriate access controls allowing unauthorised use; (c) equipment failure; (d) human error; (e) unforeseen circumstances, such as a fire or flood; (f) deliberate attacks on systems, such as hacking, viruses or phishing scams; and/or (g) alteration of Personal Information without permission and loss of availability of Personal Information.
- 14.3 Abman will address any Data Breach in accordance with the terms of POPIA.
- 14.4 Abman will notify the Regulator and the affected Data Subject (unless the applicable law requires that we delay notification to the Data Subject) in writing in the event of a Data Breach (or a reasonable belief of a Data Breach) in respect of that Data Subject's Personal Information.
- 14.5 Abman will provide such notification as soon as reasonably possible and, where feasible, not later than 72 (seventy two) hours after having become aware of any Data Breach in respect of such Data Subject's Personal Information.
- 14.6 [Where Abman acts as an 'Operator' and should any Data Breach affect the data of Data Subjects whose information Abman Processes as an Operator, Abman shall notify the relevant Responsible Party immediately where there are reasonable grounds to believe that the Personal Information of relevant Data Subjects has been accessed or acquired by any unauthorised person.]

15 PROVISION OF PERSONAL INFORMATION TO THIRD PARTY SERVICE PROVIDERS

- 15.1 Abman may disclose Personal Information to Third Parties and will enter into written agreements with such Third Parties to ensure that they Process any Personal Information in accordance with the provisions of this Policy, and POPIA.
- 15.2 Abman notes that such Third Parties may assist Abman with the purposes listed in paragraph 7.4 above – for example, service providers may be used, *inter alia*: (i) to notify the Data Subjects of any pertinent information concerning Abman, (ii) for data storage and/or (iii) to assist Abman with auditing processes (external auditors).
- 15.3 Abman will disclose Personal Information with the consent of the Data Subject or if Abman is permitted to do so without such consent in accordance with the applicable laws.
- 15.4 Further, Abman may also send Personal Information to a foreign jurisdiction outside of the Republic of South Africa, including for Processing and storage by Third Parties.
- 15.5 When Personal Information is transferred to a jurisdiction outside of the Republic of South Africa (including to any Abman Associated Entity), Abman will obtain the necessary consent to transfer the Personal Information to such foreign jurisdiction or may transfer the Personal Information where Abman is permitted to do so in accordance with the provisions applicable to cross-border flows of Personal Information under POPIA.
- 15.6 The Data Subject should also take note that the Processing of Personal Information in a foreign jurisdiction may be subject to the laws of the country in which the Personal Information is held, and may be subject to disclosure to the governments, courts of law, enforcement or regulatory agencies of such other country, pursuant to the laws of such country.

16 ACCESS TO PERSONAL INFORMATION

- 16.1 A Data Subject has certain rights under POPIA, including the following:
- 16.1.1 **a right of access**: a Data Subject having provided adequate proof of identity has the right to: (i) request a Responsible Party to confirm whether any Personal Information is held about the Data Subject; and/or (ii) request from a Responsible Party a description of the Personal Information held by the Responsible Party including information about Third Parties who have or have had access to the Personal Information. A Data Subject may request:

- 16.1.1.1 Abman to confirm, free of charge, whether it holds any Personal Information about him/her/it; and
- 16.1.1.2 to obtain from Abman the record or description of Personal Information concerning him/her/it and any information regarding the recipients or categories of recipients who have or had access to the Personal Information. Such record or description is to be provided:
 - 16.1.1.2.1 within a reasonable time; and
 - 16.1.1.2.2 in a reasonable manner and format and in a form that is generally understandable.
- 16.1.2 **a right to request correction or deletion:** a Data Subject may also request Abman to–
 - 16.1.2.1 correct or delete Personal Information about the Data Subject in its possession or under its control that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully; or
 - 16.1.2.2 destroy or delete a record of Personal Information about the Data Subject that Abman is no longer authorised to retain records in terms of POPIA's retention and restriction of records provisions.

On receipt of such a request, Abman is required to, as soon as is reasonably practicable –

 - 16.1.2.2.1 correct the information;
 - 16.1.2.2.2 delete or destroy the information;
 - 16.1.2.2.3 provide the Data Subject with evidence in support of the information; or
 - 16.1.2.2.4 where the Data Subject and Responsible Party cannot reach agreement on the request and if the Data Subject requests this, Abman will take reasonable steps to attach to the information an indication that correction has been requested but has not been made;
- 16.1.3 **a right to withdraw consent and to object to processing:** a Data Subject that has previously consented to the Processing of his/her/its Personal Information has the right to withdraw such consent and may do so by providing Abman with notice to such effect at the address set out in paragraph 21. Further, a Data Subject may object, on reasonable grounds, to the Processing of Personal Information relating to him/her/it.

- 16.2 Accordingly, Abman may request the Data Subject to provide sufficient identification to permit access to, or provide information regarding the existence, use or disclosure of the Data Subject's Personal Information.
- 16.3 Any such identifying information shall only be used for the purpose of facilitating access to or information regarding the Personal Information.
- 16.4 The Data Subject can request in writing to review any Personal Information about the Data Subject that Abman holds including Personal Information that Abman has collected, utilised or disclosed, as well as the following information: (i) the purposes of Processing; (ii) the categories of Personal Information concerned; (iii) where possible, the envisaged period for which the Personal Information will be stored or, if not possible, the criteria used to determine that period; (iv) the existence of the right to request from Abman rectification or erasure of Personal Information or restriction of Processing of Personal Information concerning the Data Subject or to object to such processing; (v) the right to lodge a complaint with the Regulator; (vi) where the Personal Information is not collected from the Data Subject, any available information as to their source; and (vii) the existence of automated Processing, including profiling and, at least in those cases, meaningful information about the logic involved as well as the significance and the envisaged consequences of such processing for the Data Subject.
- 16.5 Abman shall respond to these requests in accordance with POPIA and will provide the Data Subject with any such Personal Information to the extent required by law and any of Abman's policies and procedures which apply in terms of the Promotion of Access to Information Act No. 2 of 2000 ("**PAIA**").
- 16.6 The Data Subject can challenge the accuracy or completeness of his/her/its Personal Information in Abman's records at any time in accordance with the process set out in Abman's manual developed in terms of PAIA for accessing information ("**PAIA Manual**").
- 16.7 If a Data Subject successfully demonstrates that their Personal Information in Abman's records is inaccurate or incomplete, Abman will ensure that such Personal Information is amended or deleted as required (including by any Third Parties).

17 **TIME PERIODS**

- 17.1 Abman will respond to each written request of a Data Subject not later than 30 (thirty) days after receipt of such requests. Under certain circumstances, Abman may, however, extend the original period of 30 (thirty) days once for a further period of not more than 30 (thirty) days.

- 17.2 A Data Subject has the right to make a complaint to Abman in respect of this time limit by contacting Abman using the contact details provided in paragraph 21 below.

18 COSTS TO ACCESS TO PERSONAL INFORMATION

The prescribed fees to be paid for copies of the Data Subject's Personal Information are listed in the PAIA Manual.

19 USE OF WEBSITE COOKIES

- 19.1 Our Website uses cookies, which are small text files sent by a web server to store on a web browser. They are used to ensure websites function properly, store user preferences when needed and collect anonymous statistics on website usage.
- 19.2 You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to the website. If you accept a "cookie" or fail to deny the use of "cookies", you agree that we may use your personal information collected using "cookies" (subject to the provisions of this Policy). Where you either reject or decline cookies, you are informed that you may not be able to fully experience the interactive features of our Website.

20 CHANGES TO THIS POLICY

- 20.1 Abman reserves the right to make amendments to this Policy from time to time and will use reasonable efforts to notify Data Subjects of such amendments.
- 20.2 The current version of this Policy will govern the respective rights and obligations between you and Abman each time that you access and use our Website.

21 CONTACTING US

- 21.1 All comments, questions, concerns or complaints regarding your Personal Information or this Policy, should be forwarded to us as follows —

Abreal (Pty) Ltd
Abcon House
Fairway Office Park
52 Grosvenor Road
Bryanston, Sandton

Tel. 011 510 9999

Fax. 011 510 9990

Information Officer: Helen Cockrell

- 21.2 If a Data Subject is unsatisfied with the manner in which Abman addresses any complaint with regard to Abman's Processing of Personal Information, the Data Subject can contact the office of the Regulator, the details of which are set out below –

Website: **<http://justice.gov.za/inforeg/>**

Tel: 012 406 4818

Fax: 086 500 3351

Email: **inforeg@justice.gov.za**